

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC, and  
IRISH BLUE & GOLD, INC.,

Plaintiffs,

v.

CURRENEX, INC., GOLDMAN SACHS & CO.  
LLC, HC TECHNOLOGIES, LLC, STATE  
STREET BANK AND TRUST COMPANY, and  
JOHN DOE DEFENDANTS 1-5,

Defendants,

Case No. 1:21-CV-06598

**CLASS ACTION**

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
TIME TO RESPOND TO THE  
COMPLAINT AND THE BRIEFING  
SCHEDULE**

**WHEREAS**, on August 4, 2021, Plaintiffs Edmar Financial Company, LLC and Irish Blue & Gold, Inc. (together, “Plaintiffs”) filed a putative class action complaint (the “Complaint”) alleging claims covering conduct dating back to 2005 against defendants Currenex, Inc., Goldman Sachs & Co. LLC, HC Technologies, LLC, State Street Bank and Trust Company, and John Doe Defendants 1-5 (collectively, “Defendants”) (Dkt. No. 1);

**WHEREAS**, defendants Currenex, Inc., Goldman Sachs & Co. LLC, and State Street Bank and Trust Company have each been served with the Summons and Complaint in this action, and defendant HC Technologies, LLC disputes that it has been served but has agreed to waive service of the Summons and Complaint;

**WHEREAS**, on account of the various methods of service referenced immediately above, the Defendants currently have multiple, different deadlines for filing a motion to dismiss or responsive pleading;

**WHEREAS**, the parties have agreed to a schedule whereby each of the Defendants shall operate pursuant to a common schedule for briefing of motions to dismiss the Complaint, which will enable all parties to most efficiently prepare their brief(s) in connection with the motions, and the Court to most efficiently consider and decide them;

**WHEREAS**, there has been no prior request for an extension of any deadline in this action;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and among the undersigned counsel for the signatory parties, subject to the Court's approval, that:

1. Defendants shall each answer, move to dismiss or otherwise respond to the Complaint by October 13, 2021. If one or more Defendants moves to dismiss the Complaint, Plaintiffs shall file their opposition by December 17, 2021. Defendants shall file their reply or replies by January 28, 2022.

2. If Plaintiffs elect to amend the Complaint in response to the filing of any motion(s) to dismiss, they shall notify Defendants no later than November 12, 2021. At that point, the parties shall meet and confer in good faith with regard to a new schedule in this action.

3. Nothing in this stipulation prevents any party from seeking further extensions on the consent of the parties or from the Court.

4. This stipulation may be executed in counterparts.

Dated: August 24, 2021  
New York, New York

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*Counsel for Defendant Goldman Sachs & Co.  
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I, Gregg L. Weiner, am the ECF user whose username and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER REGARDING TIME TO RESPOND TO THE COMPLAINT AND THE BRIEFING SCHEDULE. I hereby represent that all signatories to this document have concurred in this filing.

Dated: August 24, 2021  
New York, New York

ROPES & GRAY LLP

/s/ Gregg L. Weiner  
Gregg L. Weiner

\* \* \*

**ORDER**

IT IS SO ORDERED.

DATED: \_\_\_\_\_

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THE HONORABLE LEWIS A. KAPLAN  
UNITED STATES DISTRICT JUDGE